

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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**R. ALEXANDER ACOSTA, Secretary of Labor,  
United States Department of Labor**

**NOTICE OF MOTION**

Plaintiff,

Civil Action No.: 5:17-cv-00561

v.

(BKS/ATB)

**LIBERTY GAS STATION AND CONVENIENCE  
STORE, LLC, LIBERTY PIZZA &  
CONVENIENCE, INC., HUSEYIN TURAN,  
Individually and as Owner,**

Defendants.

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**PLEASE TAKE NOTICE** that upon the pleadings herein, the Affidavit of Lawrence M. Ordway, Jr., Esq. sworn to the 28<sup>th</sup> day of February, 2018, with the exhibit attached thereto, and the Memorandum of Law in support, dated the 28<sup>th</sup> day of February, 2018, Defendants, Liberty Gas Station and Convenience Store, LLC, Liberty Pizza & Convenience, Inc., Huseyin Turan, Individually and as Owner, by and through their attorneys, Bousquet Holstein PLLC, will move this Court before the Honorable Andrew T. Baxter, United States Magistrate Judge, at the U.S. District Courthouse, 100 S. Clinton St., Syracuse, New York, on the 12<sup>th</sup> day of April, 2018, or as soon thereafter as counsel may be heard, for an Order to File Certain Documents Under Seal pursuant to Rule 83.13 of the Local Rules of the Northern District of New York, and for such other and further relief as to this Court seems proper. The Court conference relative to this motion was held February 5, 2018, with Gregory D. Eriksen, Esq., of our office.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 7.1 (b) of the United States District Court for the Northern District of New York, opposing papers, if any, must be filed with the Court and served upon Defendants not less than seventeen (17) days prior to the return date of this Motion.

Dated: February 28, 2018

**BOUSQUET HOLSTEIN PLLC**



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TO: Amy Tai, Esq.  
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Office of the Solicitor  
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Mr. Huseyin Turan  
Liberty Gas Station and Convenience Store, LLC  
Liberty Pizza & Convenience, Inc.  
200 South Main Street  
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